

Tenneco
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Houston, Texas 77252 2511
Tel 713 757 2131
Laurent B. Webb
Attorney
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August 2, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Damaris Cristiano
Asst. Regional Counsel
U. S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

RE: SCP/CARLSTADT SITE DE MINIMIS AGREEMENT

Dear Ms. Cristiano:

This letter is to inform you that Tenneco Polymers Inc. (Tenneco) desires to be included in the SCP/Carlstadt site de minimis settlement agreement. The de minimis amount for Tenneco (as derived by the PRP Group investigations) will be 14,250 gallons. This number was arrived at by the addition of 6,750 gallons which existing invoices (see Attachment 1) state went to the site (EPA used 6,800 gallons in their waste-in list), and one-half of the amount, i.e., 15,000 gallons, shown on some other less rigorous documents (see Attachment 2) which only possibly went to the site. Thus, the PRP Group deemed Tenneco's share to be 6,750 gallons plus 7,500 gallons (one-half of 15,000 gallons), or 14,250 gallons.

Further, for your information, the assets of Tenneco Chemicals, Inc. were sold beginning in 1982, and the corporation was dissolved and liquidated in 1988. There is no successor to Tenneco Chemicals, Inc. However, for administrative purposes we prefer to show Tenneco Polymers Inc. as the settling entity.

We appreciate EPA's cooperation in this site. If you have any questions or need further information, please contact our outside counsel, Ms. Sara Beth Watson at (202) 429-8064.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laurent B. Webb".

Laurent B. Webb
Attorney

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lbw\60802-01

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DATA VALIDATION REPORT FOR SCP-CARLSTADT SITE

COMPANY NAME	DESTINATION REPORTED			VOLUME REPORTED		OTHER		COMMENTS
	TRANS. NO.	MANIFEST NO.	KELLOGG DOC. NO.	QUEST. RESP.	OTHER SOURCE	QUEST. RESP.	OTHER SOURCE	
ENNECO CHEMICALS	NL	70002			CARSLTADT		2750 GAL.	6/24/78
	NL	70063			CARSLTADT		4000 GAL.	10/11/78

ATTACHMENT 1

SECTION I TO BE COMPLETED BY THE SPECIAL WASTE GENERATOR

Plant Identification Number Pick-Up Date 6/28/78 MO. 6 DAY 28 YR. 78
 Company Name Tanagra Chemicals Inc.
 Pick-Up Address New Market Rd. Piscataway, NJ
 Name of Hauler Scientific Chemical Address 411 Wilson Ave. Newark
 Name of Facility Same Address
 Emergency Spill Phone Nos.: 609-292-3560 or 609-292-7172

Handling Instructions:

(3) Flammable

Flammable

(23) Flammable

Waste Type		Number of Containers	Physical State	Hazard ID.	Total Quantity Identify units in pounds or gallons use P for pounds and G for gallons	Pounds or Gallons	SECTION V TO BE COMPLETED BY THE SPECIAL WASTE FACILITY OPERATOR
						Rejected Amount	
1.	Acid Solution						
2.	Alkaline Solution						
3.	Arsenic Residues						
4.	Catalyst Residues						
5.	Cyanide Residues						
6.	Chlorinated (Dioxin, Furan) Residues						
7.	Etching, Pickling, & Plating Residue						
8.	Explosive Residue						
9.	Filter Cloths, Filter Aids						
10.	Ester, Alcohol, Ether, Ketone, Glycol Residues						
11.	Heavy Metal Residue						
12.	Organic and Heavy Metal Residue Mixture						
13.	Latex Residue						
14.	Peroxide						
15.	Oil and Oil Sludges Emulsions						
16.	Paint and Pigment Residues						
17.	Pesticides						
18.	Pharmaceutical Wastes (Drugs, etc.)						
19.	Isocyanates, Amines, Mercaptans, Amide						
20.	Plasticizer, Resin, Monomer, Elastomer Residues						
21.	PCB, PBB Contaminated Materials						
22.	Solvent, Halogenated Organic	50	L	F	2750	G	
23.	Solvent, Mixed						
24.	Still Bottoms						
25.	Radioactive Residue						
26.	Tetraethyl Lead Residues						
	Other (See Instructions)						
27.							
28.							
29.							
30.							

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SECTION V TO BE COMPLETED BY THE SPECIAL WASTE FACILITY OPERATOR

I certify that the above information is correct to the best of my knowledge.

Date 6/28/78Signature and Title A. J. Thomas - Plant Eng.

SECTION II TO BE COMPLETED BY THE SPECIAL WASTE HAULER

I certify that the described quantity of material (s) listed in Section I was collected by me. State NJ Number 21A0175
 Date 6/28/78 Signature W. T. Jones Vehicle License Plate Number 21A0175

SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER

Name of Hauler SCP Address 216 Paterson Plank Rd.
 I certify that the described quantity of material (s) listed in Section I was hauled by me to the Special Waste Facility named in Section I. State NJ Number 21A0175
 Date 6/28/78 Signature W. T. Jones Vehicle License Plate Number 21A0175

SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE FACILITY

Name of Facility SCP Address 216 Paterson Plank Rd.
 Registration Number 02895A Date Waste Received 6/28/78 ☒ Accepted ☐ Rejected
 I certify that the hauler stated above delivered the waste described in Section I to this Facility.

Date 6/28/78 Signature and Title Man. B. B. B. B.

SECTION I TO BE COMPLETED BY THE SPECIAL WASTE GENERATOR

Plant Identification Number 00464 Pick-Up Date 10 11 78
 Company Name TUNNEW CHEMICALS INC MO. DAY YR.
 Pick-Up Address 109 KERU ROAD CARLSTADT, NJ
 Name of Hauler SCIENTIFIC CHEMICAL Address 411 WILSON AVE NEWARK, NJ
 Name of Facility SCIENTIFIC CHEMICAL Address 411 WILSON AVE NEWARK, NJ
 Emergency Spill Phone Nos.: 609-292-5560 or 609-292-7172

Handling Instructions:

(23) FLAMMABLE

Waste Type	Number of Containers	Physical State	Hazard ID.	Total Quantity Identify units in pounds or gallons use P for pounds and G for gallons	Pounds or Gallons	SECTION V TO BE COMPLETED BY THE SPECIAL WASTE FACILITY OPERATOR Rejected Amount
1. Acid Solution						
2. Alkaline Solution						
3. Arsenic Residues						
4. Catalyst Residues						
5. Cyanide Residues						
6. Chlorinated (Dioxin, Furan) Residues						
7. Etching, Pickling, & Plating Residue						
8. Explosive Residue						
9. Filter Clays, Filter Aids						
10. Ester, Alcohol, Ether, Ketone, Glycol Residues						
11. Heavy Metal Residue						
12. Organic and Heavy Metal Residue Mixture						
13. Latex Residue						
14. Peroxide						
15. Oil and Oil Sludges, Emulsions						
16. Paint and Pigment Residues						
17. Pesticides						
18. Pharmaceutical Wastes (Drugs, etc.)						
19. Lacrators, Amines, Mercaptans, Amide						
20. Plasticizer, Resin, Monomer, Elastomer Residues						
21. PCB, PBB Contaminated Materials						
22. Solvent, Halogenated Organic						
23. Solvent, Mixed	1	L	F	4000	0	
24. Still Bottoms						
25. Radioactive Residue						
26. Tetraethyl Lead Residues						
Other (See Instructions)						
27.						
28.						
29.						
30.						

I certify that the above information is correct to the best of my knowledge.
 Date 10-11-78 Signature and Title Richard James Shipping MGR.

SECTION II TO BE COMPLETED BY THE SPECIAL WASTE HAULER

I certify that the described quantity of material(s) listed in Section I was collected by me. State Number
 Date 10/11/78 Signature Richard James Vehicle License Plate Number ND 8VH637

SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER

Name of Hauler SCC Address 411 WILSON AVE NEWARK, NJ
 I certify that the described quantity of material(s) listed in Section I was hauled by me to the Special Waste Facility named in Section I
 Date 10/11/78 Signature Richard James Vehicle License Plate Number ND 8VH637

SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE FACILITY

Name of Facility SCC Address 216 Jefferson Plank Pl.
 Registration Number 02051A Date Waste Received 10/11/78 ☒ Accepted ☐ Rejected
 I certify that the hauler stated above delivered the waste described in Section I to this Facility.

Date 10/11/78 Signature and Title Richard James

PRELIMINARY LISTING OF SHIPMENTS FROM SCP-CARLSTADT PRP QUESTIONNAIRE RESPONSE
SUBMITTED BY TENNECO POLYMERS (PRP NUMBER 720102)
CLEAN SITES, INC.
01/29/91

TRANSACTION NUMBER	DATE TRANSPORTER OTHER INFORMATION:	FAC #	SHIPMENT FORM & NUMBER	AMOUNT(S)	BELIEVED RECEIVED AT SCP CARLSTADT?	TRANSACTION INVOLVES	MATERIAL GENERAL DESCRIPTION MATERIAL CHEMICAL DESCRIPTION	KNOWN TO CONTAIN PCBS?
1	11/02/70 001 (#101) GALAXIE CHEMICALS, INC.		1 TANK TRUCK	5,000 GALLONS	UNKNOWN		SOLVENT FOR RECOVERY DIMETHYL FORMAMIDE	NO
2	11/10/70 001 (#101) GALAXIE CHEMICALS, INC.		1 TANK TRUCK	5,000 GALLONS	UNKNOWN		SOLVENT FOR RECOVERY DIMETHYL FORMAMIDE	NO
3	**/**/75 001 (#102) SCIENTIFIC CHEMICAL PROCESSING, INC. COMMENT: THIS SHIPMENT ALLEGED BY ECKHARDT SURVEY. UNKNOWN DATE IN 1975.			5,000 GALLONS	UNKNOWN	SCP	UNKNOWN UNKNOWN	NO

END OF RECORDS FOR TENNECO POLYMERS

TOTAL NUMBER OF GALLONS BELIEVED BY PARTY TO HAVE GONE TO SCP IS	0
TOTAL NUMBER OF GALLONS NOT BELIEVED BY PARTY TO HAVE GONE TO SCP IS	0
TOTAL NUMBER OF GALLONS <u>UNKNOWN</u> BY PARTY TO HAVE GONE TO SCP IS	<u>15,000</u>